

Reexamination Control No.: 90/005,708

Docket No.: HO-P02233US0

E2 routing said tubing off of said reel onto said tubing storage spool, said tubing storage spool mounted on a cradle vertically and horizontally adjustable to accept varying spool widths and diameters.

### REMARKS/ARGUMENTS

This second supplemental amendment is submitted per the request of the Examiner to place the amendment in the proper form pursuant to the MPEP in furtherance of the supplemental amendment filed December 23, 2002.

This Second Supplemental Amendment is served on the third party requester for reexamination as evidenced by a certificate of service provided herewith in the manner provided in 37 CFR 1.248.

Claims 4-9 and 11 are pending in the application. Original claims 1, 2, 3 and 10 were previously canceled and claim 4 was rewritten into independent form via a previous amendment. Claims 5 and 9 were amended to depend from claim 4.

Claims 7 and 8 have been amended to depend from claim 6, which overcomes the rejection based on 35 U.S.C. 112, second paragraph.

Claim 11 has been amended to read that the method of retrieving the coiled tubing is from beneath a surface and that the reel is rotated for receiving the coiled tubing at an angle of less than 90° to the surface. Support for this feature is found in claim 4, and on page 3, lines 6-8 and 14-17, and page 10, lines 15-26. It is submitted that this claim is allowable over the prior art for same reasons that claim 4 was found allowable, i.e., because the prior art teaches an angle of 90° and does not teach or suggest receiving the coiled tubing at an angle of less than 90°.

For these reasons it is submitted that this application is condition for allowance. If there are any question, call the undersigned at the telephone number indicated below.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

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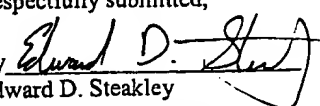
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Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2375, under Order No. HO-P02233US0 from which the undersigned is authorized to draw.

Dated: April 3, 2003

Respectfully submitted,

By

  
Edward D. Steakley

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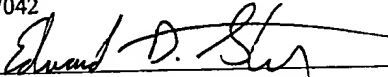
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#19 Control  
Service  
4/19/03

**CERTIFICATE OF SERVICE**

I do hereby certify that a copy of the Response to Office Action, in a manner provided in 37 CFR 1.248, is being deposited with the United States Postal Service on April 3, 2003, addressed to:

Cynthia G. Seal  
2925 Briarpark, Suite 930  
Houston, Texas 77042

  
Edward D. Steakley

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